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6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

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9 UNITED STATES OF AMERICA,  
10  
11 Plaintiff,  
12 v.  
13 FREDERICK THOMAS,  
14 Defendant.

**Case No. 2:17-cr-00306-JCM-VCF-7**

**STIPULATION TO CONTINUE  
CHANGE OF PLEA HEARING  
(First Request)**

15 **IT IS HEREBY STIPULATED AND AGREED**, by and between Defendant Frederick  
16 Thomas, by and through his counsel, Maysoun Fletcher, Esq., and the United States of America,  
17 by its counsel, Chad McHenry, Esq., that the Change of Plea Hearing currently scheduled for  
18 June 18, 2021, at 10:30 a.m. be vacated and set to a date and time convenient to this Court but  
19 no sooner than thirty (30) days. The Stipulation is entered into for the following reasons:

- 20 1. Counsel for the defendant recently received a new production of discovery labeled  
21 Volume 15 and needs an opportunity to review it prior to the defendant's change of plea.  
22 2. Mr. Thomas is currently out of custody and does not object to this request.  
23 3. The United States of America does not object to this request

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1       4. Additionally, denial of this request for continuance could result in a miscarriage of  
2 justice.

3       5. This is the First request for a continuance of Mr. Thomas' Change of Plea Hearing and  
4 is not sought for delay.

5       DATED this 10th day of June, 2021.

6  
7       /s/ Chad McHenry  
8 Chad McHenry, Esq.  
9 Trial Counsel for the United States

10       /s/ Maysoun Fletcher  
11 Maysoun Fletcher, Esq.  
12 Counsel for Frederick Thomas  
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15 **FINDINGS OF FACTS**

16 Based upon the pending stipulation of the parties, and good cause appearing therefore, the  
17 Court finds that:

- 18 1. Counsel for the defendant recently received a new production of discovery labeled  
19 Volume 15 and needs an opportunity to review it prior to the defendant's change of plea.
- 20 2. Mr. Thomas is currently out of custody and does not object to this request.
- 21 3. The United States of America does not object to this request.
- 22 4. Additionally, denial of this request for continuance could result in a miscarriage of  
23 justice.
- 24 5. This is the First request for a continuance of Mr. Thomas' Change of Plea Hearing and  
25 is not sought for delay.  
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**ORDER**

**IT IS THEREFORE ORDERED** that the change of plea hearing set for June 18, 2021, at 10:30 a.m. is vacated and continued to August 11, 2021, 2021 at 11:00 a.m. in Courtroom 6A.

Dated June 11, 2021.

  
UNITED STATES DISTRICT JUDGE